REMARKS/ARGUMENTS

Prior to entry of this Amendment, the application included claims 1-23. No claims have been amended, added, or canceled. Hence, after entry of this Amendment, claims 1-23 stand pending for examination.

Claims 1-23 stand rejected under 35 U.S.C. § 102(e) as being anticipated by the cited portions of U.S. Patent No. 7,013,315 to Boothby ("Boothby").

Rejections Under 35 U.S.C. § 102(e)

The Applicants respectfully traverse the rejection of all claims rejected under 35 U.S.C. § 102(e) since the Office Action has not cited a reference that teaches all of the claim elements, either expressly or inherently, as required for a proper rejection under 35 U.S.C. § 102(e).

According to claim 1, the user designates a field to be a key segment. Boothby does not teach designating a field to be a key segment. The Office Action cites col. 5, ll. 49-54, for this teaching. At that location, however, Boothby teaches that the user may select default or custom field mapping, neither of which is designating a field to be a key segment. Field mapping merely identifies which fields in records of one file are mapped to fields in records of another file. No field is singled out as being a key segment as recited in claim 1. In other words, Boothby's user is unable to designate a particular field to be compared as is the case in the Applicants' claimed invention. The Applicants argued this previously and the final Office Action did not respond to this argument as required by the guidelines. Hence, the Applicants maintain that claim 1 is allowable, at least for this reason.

Further, as previously stated, Boothby's CIGs are not the same as the Applicants' temporary electronic files. Boothby's CIGs are limited to three records. The Applicants' temporary electronic file, on the other hand, records the data from the matching key segment each time a match occurs ("upon each occurrence of a match of data in the key segment of a

record in the first file to data in the related key segment of a record in the second file, creating a record in a temporary electronic file, wherein the record in the temporary file includes at least one field and wherein the at least one field includes a copy of the matching data from the first and second files"). Claim 1 is believed to be allowable for this additional reason.

Moreover, Boothby's CIG includes copies of data from both files being compared. But the Applicants' temporary electronic file includes a single copy of the matching data ("wherein the record in the temporary file includes at least one field and wherein the at least one field includes a copy of the matching data from the first and second files" emphasis added). Hence, Boothby's CIGs fail to anticipate the Applicants' invention as recited in claim 1.

Independent claims 10 and 18 include similar limitations and are believed to be allowable for similar reasons. The remaining claims depend from one of these independent claims and are believed to be allowable, at least for the reasons stated above.

Moreover, claim 8 is believed to be allowable because Boothby does not teach selecting data for the temporary file based in part on logic operators. At the location cited by the Office Action for this teaching, Boothby appears to teach the compare function, but nothing is mentioned about logic operators and claim 8 is believed to be allowable for this additional reason. Claim 9 depends from claim 8 and is believed to be allowable for the additional reason that Boothby does not teach logic operators. The Office Action states that "strong match" is the same as "equal to." This is not the case. Boothby defines "strong match," which is when non-key fields of two records match (col. 12, l. 65). This is not the same as a logic operator "equal to" and claim 9 is believed to be allowable for this additional reason. Claims 16, 17, 22 and 23 include similar elements and are believed to be allowable for similar reasons.

Claim 18 is believed to be allowable for the additional reason that Boothby does not teach "receiving instructions identifying data to be selected from the temporary file." This limitation is not found in claim 1, and the Office Action provides no citation for this limitation. For the Office Action to be correct in rejecting claim 18, Boothby would have to teach receiving

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instructions identifying data to be selected from the CIG. This is not found in Boothby, and claim 18 is believed to be allowable for this additional reason.

Conclusion

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance and an action to that end is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,

Date: <u>March 12, 2007</u>

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